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7 LOANSTREAM MORTGAGE

8

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**

11

12	KIMBERLY HUDSON-BRYANT, individually and on behalf of all others	Case No. 8:24-cv-00067-FWS-JDE
13	similarly situated,	
14	Plaintiffs,	**JOINT MOTION AND STIPULATION TO CONTINUE CASE DEADLINES**
15	v.	
16		Judge: Hon. Fred W. Slaughter
17	OCMBC, INC. dba LOANSTREAM, PREMIER FINANCIAL MARKETING	Magistrate: Hon. John D. Early
18	LLC D/B/A RESMO LENDING, AND SEAN ROBERTS	Action Filed: January 11, 2024
19		Trial Date: TBD
20	Defendants.	

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Pursuant to Local Rules 7-1 and 7-3, and Section VIII of the Court's Civil Standing Order, Plaintiff Kimberly Hudson-Bryant ("Plaintiff") and Defendants OCMBC, Inc. d/b/a LoanStream ("LoanStream") and Sean Roberts ("Roberts") (collectively, "Defendants") (together with Plaintiff, the "Parties") hereby stipulate and agree as follows:

WHEREAS, the Court issued a revised scheduling order under Federal Rule of Civil Procedure 26(f) on October 24, 2024 ("Scheduling Order"), which imposed, among other things, a non-expert discovery cut-off of May 12, 2025. (ECF No. 48).

WHEREAS, the Parties have engaged in substantial written and oral discovery since the Court issued the Scheduling Order, but recent, unforeseen scheduling and health-related issues involving a key percipient witness and LoanStream's 30(b)(6) witness prevent the completion of discovery pursuant to the Scheduling Order, which in turn prevents compliance with the class certification and expert discovery deadlines.

WHEREAS, the Parties now jointly agree, stipulate, and request that the Court vacate and continue all deadlines in the Scheduling Order by approximately 60 days, as proposed below or as otherwise convenient for the Court.

WHEREAS, the Parties previously requested a prior extension to allow additional time to address the new claims asserted in Plaintiff's first amended complaint. (*See* ECF No. 40).

WHEREAS, the Parties have exercised due diligence to date and believe good cause exists to modify the Scheduling Order for at least the reasons outlined herein and in the accompanying declaration of Thomas F. Landers, filed concurrently herewith.

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NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, AGREE and request that the Court extend all future deadlines in this case as follows:

Event	Current Deadline	Proposed Deadline
Start of Jury Trial	11/18/25	01/26/26
Final Pretrial Conference/Hearing on Motions in Limine	11/06/25	01/15/26
L/D to File Motion for Class Certification	05/22/25	07/21/25
L/D to File Opposition to Class Certification	06/19/25	08/19/25
L/D to File Reply to Class Certification	07/03/25	09/03/25
Hearing on Motion for Class Certification	07/24/25	09/24/25
Non-Expert Discovery Cut-Off	05/12/25	07/11/25
Expert Disclosure (Initial)	05/28/25	07/28/25
Expert Disclosure (Rebuttal)	06/11/25	08/11/25
Expert Discovery Cut-Off	06/15/25	08/15/25
Last Date to Hear Motions	09/04/25	11/06/25
L/D to Complete Settlement Conference	09/16/25	11/20/25
Trial Filings (First Round)	10/23/25	12/23/25
Trial Filings (Second Round)	10/30/25	01/09/26

IT IS SO STIPULATED.

[Signatures on Following Page]

JOINT STIPULATION TO CONTINUE CASE DEADLINES

1   DATED: April 25, 2025   SOLOMON WARD SEIDENWURM &
2   SMITH, LLP
3
4   By: /s/ Thomas F. Landers
                                         THOMAS F. LANDERS
5   Attorneys for Defendant,
                                         OCMBC, INC., dba
6   LOANSTREAM MORTGAGE
7
8   DATED: April 25, 2025   PARONICH LAW, PC
9
10   By: /s/ Anthony L. Paronich
                                         ANTHONY L. PARONICH
11   Attorneys for Plaintiff,
                                         KIMBERLY HUDSON-BRYANT
12
13
14   DATED: April 25, 2025   PERRONG LAW LLC
15
16   By: /s/ Andrew R. Perrong
                                         ANDREW R. PERRONG
17   Attorneys for Plaintiff,
                                         KIMBERLY HUDSON-BRYANT
18
19
20   DATED: April 25, 2025   DEFENDANT PRO SE
21
22   By: /s/ Sean Roberts
                                         SEAN ROBERTS
23   Individual Defendant
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1 **ATTESTATION OF SIGNATURE**

2   Pursuant to Central District Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the

3 content of this document is acceptable to Mr. Anthony L. Paronich and Mr. Andrew

4 R. Perrong, counsel for Plaintiff, and Mr. Sean Roberts, defendant *pro se* in this

5 action. I further certify that I obtained authorization from Mr. Paronich, Mr. Perrong,

6 and Mr. Roberts prior to affixing their electronic signatures to this document.

7   */s/ Thomas F. Landers*
                                          THOMAS F. LANDERS
8   Attorneys for Defendant,
                                          OCMBC, INC. dba
9   LOANSTREAM MORTGAGE

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